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Attorney for Plaintiffs
Hunter Killer Productions, Inc.,
TBV Productions, LLC,
Venice PI, LLC,
Bodyguard Productions, Inc., and
LHF Productions, Inc.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Hunter Killer Productions, Inc. et al,)	Case No.: 1:19-cv-00168-LEK-KJM
)	(Copyright)
Plaintiffs,)	
vs.)	PLAINTIFF'S MOTION FOR
)	DEFAULT JUDGMENT AGAINST
Qazi Muhammad Zarlish, et al.)	DEFENDANT NGHI PHAN NHAT;
)	MEMORANDUM IN SUPPORT OF
Defendants.)	MOTION; DECLARATION OF
)	COUNSEL; EXHIBITS 1-8; BILL OF
)	COSTS; CERTIFICATE OF
)	COMPLIANCE WITH LR 7.4(b);
)	CERTIFICATE OF SERVICE
)	
)	

PLAINTIFFS' MOTION FOR DEFAULT JUDGMENT AGAINST
DEFENDANT NGHI PHAN NHAT

Plaintiffs Hunter Killer Productions, Inc., TBV Productions, Inc., Venice PI,
LLC, Bodyguard Productions, Inc., and LHF Productions, Inc. ("Plaintiffs"), by

and through their counsel, respectfully move that this Court enter a default judgment in Plaintiffs' favor for the relief demanded in its Complaint filed on April 3, 2019, (hereafter: "the Complaint") pursuant to Fed. R. Civ. P. 55(b)(2) on the grounds that Defendant NGHI PHAN NHAT ("Nhat") has failed to answer or otherwise defend the Complaint, and Plaintiffs are entitled to judgment as a matter of law against Defendant Nhat. Plaintiff seeks judgment against Defendant Nhat for statutory damages in the amount of \$150,000, reasonable attorney's fees in the amount of \$11,707.5, Hawaii GET taxes of \$518.64 and costs of \$2639.08 as a final judgment.

Plaintiffs further seek injunctive relief permanently enjoining and restraining Defendant Nhat from promoting and distributing the Show Box app and inducing and/or contributing to infringements of the Plaintiffs' copyrighted Works, enjoining Defendant's Registrar Namesilo, provider CloudFlare, and those in privity with Defendant Nhat and with notice of the injunction, including any Internet search engines, Web hosts, domain-name registrars, and domain name registries and/or their administrators that are provided with notice of the injunction, from facilitating access to any or all domain names and websites through which Defendant Nhat engages in the distribution and promotion of the Show Box app or other software applications that induce and/or contribute to infringement of

Plaintiffs' Works. This motion is based upon the Memorandum in Support, the Declaration of Counsel, and the pleadings and record herein.

DATED: Kailua-Kona, Hawaii, September 6, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Plaintiffs
Hunter Killer Productions, Inc.,
TBV Productions, LLC,
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LHF Productions, Inc.,